

December 18, 2020

By ECF

Honorable Paul A. Engelmayer
United States District Judge
Eastern District of New York¹
40 Foley Square
New York, NY 10007

Re: *United States v. Lucio Celli*, 19 Cr. 127 (PAE)

Your Honor:

I write with the consent of the government and Pretrial Services respectfully to request that Lucio Celli's bond be modified to permit him to provide his brother, Gino Celli, with documents to scan and email to his counsel, and to allow counsel to email documents to Gino to provide to our client. Lucio would remain disallowed from otherwise using the internet, including using it to communicate, even indirectly, with anyone other than his counsel.

I have conferred with Assistant United States Attorney Anna Karamigios and Pretrial Services Officer Michael Dorn, and they consent to this request. Gino Celli has also informed me that he is amenable to this arrangement. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman

cc: Counsel of Record (by ECF)
Pretrial Services Officer Michael Dorn (by email)
Pretrial Services Officer Leo Barrios (by email)

¹ Sitting by designation.